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September 27, 2024

DELIVERED VIA ECF

Hon. Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 20D
New York, New York 10007-1312

Case Title: *Zahid Alizada v. Ilgar Talibov., et al.,*
Case No. 1:23-cv-5484-CM-OTW
Re: **Status Letter Re Discovery**

Your Honor:

Plaintiff, Zahid Alizada, and Defendant, Ilgar Talibov, write jointly to advise the Court on the status of the case.

The parties did not intend to represent that fact discovery had been completed with the exception of the deposition of Defendant Ilgar Talibov. Rather, the parties both intend to take depositions when Mr. Talibov returns to the United States at the end of October. Additionally, while the parties have exchanged discovery responses and significant document production, they are still resolving a few remaining discovery issues as to certain outstanding documents, although the parties do not believe the intervention of the Court will be necessary to resolve these issues at this time. The Parties have thus stipulated, pending the approval of the Court, that the October 31, 2024, deadline for fact discovery be as to all fact discovery, not solely the deposition of Ilgar Talibov.

The only discovery issue that may need to be raised with the Court concerns the location of Mr. Talibov's deposition. Plaintiff has provided notice of its intent to depose Mr. Talibov in person in New York, and Defendant has objected and is currently confirming for Plaintiff whether he intends to present himself for an in-person deposition in New York. If Defendant represents that he will not do so, he will seek the Court's leave pursuant to FRCP 30(b)(4) to appear via remote means from Florida.

We thank Your Honor for your attention to this matter.

Respectfully submitted,

By: /s/ David Michael Stuart Jenkins
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Application **GRANTED**. The deadline for fact discovery is hereby extended until **October 31, 2024**.

There will be no further extensions. Any discovery motions regarding Mr. Talibov's deposition shall be resolved or raised with the Court by **October 11, 2024**.

A handwritten signature in blue ink, appearing to read 'Ona T. Wang', with a horizontal line underneath.

Ona T. Wang
U.S.M.J. 10/1/2024